



INDEPENDENT
TELEPHONE & TELECOMMUNICATIONS
ALLIANCE

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September 12, 1997

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SEP 12 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: DA No. 97-1649, Nominations for Membership on the Universal Service
Administrator Advisory Committee, in CC Docket No. 96-45

Dear Mr. Caton:

The Independent Telephone and Telecommunications Alliance ("ITTA") hereby submits the original and two copies of the attached Motion to Accept Late Filed Pleading and Nomination to Membership on the Universal Service Administrator Advisory Committee in CC Docket No. 96-45.

If you have any questions regarding the attached filing, please do not hesitate to contact me.

Sincerely,



David W. Zesiger
Executive Director

enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Nominations for Membership)	
On the Universal Service)	DA No. 97-1649
Administrator Advisory Committee)	

MOTION TO ACCEPT LATE FILED PLEADING

The Independent Telephone and Telecommunications Alliance ("ITTA") hereby files this Motion to Accept Late Filed Pleading in the above-captioned proceeding concerning the nomination of a midsize incumbent local exchange carrier representative to membership on the Universal Service Administrator Advisory Committee ("USAAC"). ITTA respectfully requests that the Commission accept its nomination to the USAAC (attached) for the reasons stated herein.

ITTA is an organization of 15 midsize local exchange carriers ("LEC") formed in 1994 to give midsize LECs a greater voice in telecommunications policymaking. ITTA represents the full spectrum of midsize LEC interests. ITTA member companies currently operate in 41 states and serve over 7 million consumers (see list of member companies attached to nomination).

The Commission's public notice in the above-referenced docket requested nominations to the USAAC be submitted by August 22, 1997.¹ Due to the confusion

¹ FCC Public Notice Requesting Nominations for Membership on the Universal Service Administrator Advisory Committee in CC Docket 96-45, DA No. 97-1649 (August 1, 1997).

surrounding the multiplicity of board nominations that were concurrently pending at the time, ITTA failed to submit its nomination of a midsize LEC representative to the USAAC.² An ITTA member company was recently contacted by the Commission to bring this failure to the industry's attention and to state the need for a balanced representation on the USAAC. ITTA agrees.

It is vital that a midsize LEC representative be included among the nominees to the USAAC. It generally serves the public interest to have representation from a broad spectrum of relevant perspectives on bodies whose decisions will affect a wide range of interests in the industry. Moreover, the Federal Advisory Committee Act requires balanced representation on all federal advisory committees.³ Midsize LECs form a significant part of the telecommunications industry and have needs and interests distinct from either the largest or smallest LECs. They bring a unique perspective to the universal service issues that must be considered in selecting and reviewing the Administrator of the Universal Service Administrative Company, the chief responsibilities of the USAAC. Without a representative of midsize local exchange carriers, the USAAC will thus not be impartial and well-balanced as required by statute.

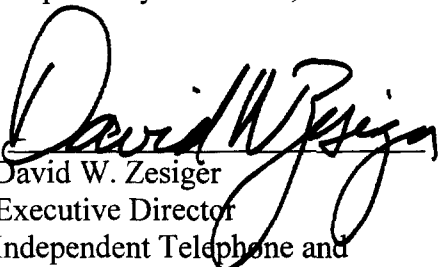
For all the above stated reasons, ITTA respectfully moves the Commission waive its deadline for accepting nominations for the USAAC and accept the attached

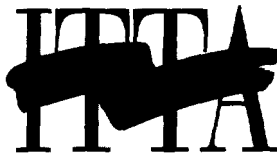
² Apart from the Commission's announcement of the creation of the USAAC in its May 8th order, the Commission created a series of other boards for which nominations were required. For example, in its order addressing changes to the Board of Directors of the National Exchange Carrier Association, the Commission created the following universal service-related Boards: the Board of Directors of the Universal Service Administrative Company (USAC), the Board of Directors of the Schools and Libraries Corporation, and the Board of Directors of the Rural Health Care Corporation. *See, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, Report and Order and Second Order on Reconsideration, CC Docket No. 96-45, FCC 97-253 (rel. July 18, 1997).

³ Federal Advisory Committee Act, 5 U.S.C., App. 2 (1988).

nomination in the above-captioned proceeding to be considered when it determines the membership of the USAAC.

Respectfully submitted,

By: 
David W. Zesiger
Executive Director
Independent Telephone and
Telecommunications Alliance
1300 Connecticut Avenue, NW Suite 600
Washington, D.C. 20036



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TELEPHONE & TELECOMMUNICATIONS
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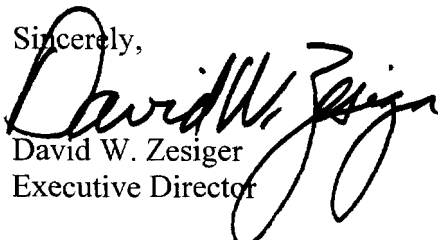
Re: DA 97-1649, Nomination to Membership on the Universal Service
Administrator Advisory Committee; CC Docket No. 96-45

Dear Mr. Caton:

Pursuant to the Commission's Public Notice DA No. 97-1649 (released August 1, 1997) the Independent Telephone and Telecommunications Alliance ("ITTA") hereby nominates Ms. Diane Smith, Senior Vice President – Federal Government Affairs, ALLTEL Corporate Services to the Universal Service Administrator Advisory Committee ("USAAC"). ITTA is an organization of 15 midsize telephone companies formed in 1994 to give midsize companies a greater voice in telecommunications policymaking (see attached member list).

ITTA believes Ms. Smith to be eminently qualified to represent the interests of ITTA's members on the universal service issues to be addressed by the USAAC. Ms. Smith has extensive experience in telecommunications policymaking and currently heads ALLTEL's Washington office. As ITTA's official nominee to the USAAC, Ms. Smith will actively participate in good faith in carrying out the policy objectives of the USAAC and will contribute to the overall balance required of the advisory committee. Ms. Smith can be reached at the following address: ALLTEL Corporate Services, Inc., 655 15th Street, NW, Suite 220, Washington, DC, 20005. Ms. Smith can be reached by telephone at (202) 783-3970 and by fax at (202) 783-3982.

Sincerely,



David W. Zesiger
Executive Director

cc: Tim Peterson
Sheryl Todd
ITS

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